



B. Braun Medical Inc.
824 Twelfth Avenue
PO Box 4027
Bethlehem, PA 18018-0027
Telephone: 610-691-5400
Telefax: 610-691-2202

May 5, 1997

US EPA Region 3
RCRA Programs
Pennsylvania Section (3 HW51)
841 Chestnut Street
Philadelphia, PA 19107

RECEIVED
PA/DC SECTION

MAY 13 1997

EPA REGION 3

Dear Madam/Sir,

Attached please find an updated subsequent notification of regulated waste activity for B. Braun Medical Inc. Please note the two updates for the company:

1. The company name has changed from Burron Medical to B. Braun Medical, Inc.
2. The generator size for B. Braun has also changed from small quantity generator to large quantity generator.

If you have any questions regarding this information, please do not hesitate to contact me at (610) 691-5400--ext. 4534.

Sincerely,

Lisa M. Millington
Environmental Coordinator

cc: H. Morrison
L. Lucas

RCRIS UNIVERSE MAINTENANCE FORM

EPA ID

P	A	D	9	8	2	6	7	9	1	6	9
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Facility Name:

Braun B Medical

Source: Notification

Notification Date

4/17/97

Part A

State Inspection

☒

EPA Inspection

☐

Waste Activity	Indicator Code	RCRA Reg Status	RCRA Reg Description
Generator	<u>1</u>	<u>R</u>	
Transporter			
Mode of Transportation:	Air <input type="checkbox"/> Water <input type="checkbox"/>	Rail <input type="checkbox"/> Other <input type="checkbox"/>	Highway <input type="checkbox"/>

<input checked="" type="checkbox"/>	IR Inspection report	
<input type="checkbox"/>	Revised Notification from the state	
<input type="checkbox"/>	Revised Notification from the facility	
<input type="checkbox"/>	Other	
	Date to Data Entry	<u>8-1-97</u>
	Batch Number	<u>288</u>
	Date QAd	

Old Universe:

506

PA 2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 04/17/97 Time start 930 Time finish 1300
Name of Inspector Stephen Puzio
Company, installation name B. Braun Medical, Inc.
Location 901 Marcon Blvd. Allentown, PA 18103
County Lehigh Municipality Hanover twp
Identification number PAD 982679169
Name of responsible official Dr. Lorraine Lucas
Title Director Medical and Scientific Affairs
Mailing Address 824 Twelfth Ave. Bethlehem, PA 18018-0027
Area code and telephone number 610-691-5400
Name of person interviewed Lisa Millington
Title Environmental Affairs Assistant
Mailing address (if different from above) 824 Twelfth Avenue P.O. Box 4027 Bethlehem,
Area code and telephone number 610-691-5400 ext. 4534 PA 18018

1. Current waste handling method:

- < 90 days
- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal, ☒ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal, ☐ reclaim
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. approx. 2,200 lbs/mo. large quantity generator
b. kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001	Chemical Conservation of GA	Valdosta, GA
D039, D008	Safety-Kleen Corp.	Allentown, PA
D001, F002 LWD, Inc.	LWD, Inc.	Calvert City KY
D009, D010	Environmental Enterprises, Inc	Cincinnati, OH

4. Source Reduction: ☐ accomplished, ☒ proposed, ☐ not proposed

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
				Generators		
1				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
1				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
		3		Dilution not used as a substitute for treatment.		3
1				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
				Storage Facilities		
	2			Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
	1			Containers marked to identify contents and accumulation date.		50(a)(2)
	1			Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	1			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	↓			Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
		3		Dilution not used as a substitute for treatment.		3
1				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
1				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
	2			Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
	↓			Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	↓			Facility retains copies of generator notifications and certifications.		7(c)(1)

495

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 04/17/97 Identification Number PAD982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Inspected facility with Charles Scheidler (PADEP), Lisa Millington (B. Braun), Karen Zakszeski (B. Braun) and Robert Tinney (B. Braun). This facility, formerly Burron Medical, is currently a large quantity generator. B. Braun Medical manufactures plastic disposable devices. Hazardous waste generated from manufacturing of plastic medical products. B. Braun currently generates approx. 2200 lbs of hazardous waste per month. I toured the manufacturing areas, waste accumulation areas, and waste treatment area. Periodically, this facility ^{also} neutralizes Ethylene Glycol process wastewater under a elementary neutralization permit by rule. The neutralized process water is then take offsite by American Chemical Exchange. I concluded the inspection by reviewing B. Braun Medical's Records on 5/6/97.

Reviewed

PPC plan

manifests

inspections

NOTE: All containers that hold hazardous waste should be labeled to properly identify them.

NO VIOLATIONS NOTED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Lisa Millington

Date

5/6/97

Inspector (signature)

Stephen Taylor

Date

05/06/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name B. Braun Medical ID Number PAD 982679169 Date 04/17/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
1				Hazardous waste determination, performed on all waste streams	262.11	H001
1				Identification number	262.12	H002
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
1				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
		3		PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
1				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		↓		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		✓		Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		3		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
		3		Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
1				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
1				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		3		e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
1				h). Proper containment and collection system(s)	265.178	H023
1				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

PAD982679169

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
1				Records retained at designated location for 20 years <i>3 years</i>	262.40(a)	H026
	2			Quarterly reports submitted to the Department	262.41(a)	H027
		3		Exception reporting procedures followed	262.42	H028
	2			Hazardous waste disposal plan, if required	262.45	H029
1				Spill reporting procedures followed	262.46(a)	H030
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	2			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
		3		Source reduction strategy prepared and available	262.80	H033

3 of 5

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)MAY 23 REC'D
JUN 6 1990

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

PA D9F2679169

II. Name of Installation (Include company and specific site name)

BURRON MEDICAL INC

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

901 MARCON BLVD.

Street (continued)

City or Town

ALLEN TOWN

State

ZIP Code

PA

18103-

County Code

County Name

LEHIGH

077 Lehigh

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

VAN EMBURG

LINDA

Job Title

Phone Number (area code and number)

MANAGER

215-691-5400

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

824 12TH AVENUE

City or Town

State

ZIP Code

BETHLEHEM

PA

18018-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

B BRAUN OF AMERICA

Street, P.O. Box, or Route Number

824 12TH AVENUE

City or Town

State

ZIP Code

BETHLEHEM

PA

18018-

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner
Indicator(Date Changed)
Month Day Year

215-691-5400

P

P

Yes

No

X

Month

Day

Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☒ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner - indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐
2. Corrosive (D002) ☐
3. Reactive (D003) ☐
4. EP Toxic (D000) ☐
- (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
- ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F 0 0 1	D 0 0 1				
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6
C 0 0 7					

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature



Name and Official Title (type or print)

GEORGE BURKE, EXEC. V.P. OPERATIONS

Date Signed

5-22-90

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY**

06/11/90

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	PAD982679169
FACILITY NAME ->	BURRON MEDICAL INC
MAILING ADDRESS ->	901 MARCON BLVD ALLENTOWN, PA 18103
INSTALLATION ADDRESS ->	901 MARCON BLVD ALLENTOWN, PA 18103

EPA Form 8700-12AB (4-80)Z

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 CHESTNUT BUILDING
PHILADELPHIA, PA 19107

ATTN: INTEGRATED MANAGEMENT AND SUPPORT SECTION - 3HW53

TO: EMBURG VANJ LINDA MGR
BURRON MEDICAL INC
901 MARCON BLVD
ALLENTOWN, PA 18103